

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

MATTHEW BAKER, et al.,  
*Plaintiffs,*

V.

BRYAN COLLIER, et al.,  
*Defendants.*

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CIVIL ACTION NO. A-22-CV-1249-RP

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DEFENDANTS' MOTION TO TRANSFER VENUE

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EXHIBIT A

AFFIDAVIT REGARDING THE HOMETOWNS  
OF CURRENT/FORMER MEMBERS OF THE  
TEXAS BOARD OF CRIMINAL JUSTICE



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

MATTHEW BAKER,  
*Plaintiffs,*

v.

BRYAN COLLIER, *et al.*,  
*Defendants.*

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CIVIL ACTION NO. A-2-CV-1249-RP

AFFIDAVIT OF JILL DURST

STATE OF TEXAS

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COUNTY OF WALKER

“BEFORE ME, the undersigned authority, on this day personally appeared **Jill Durst**; and after being first duly sworn according to law, upon her oath, deposed and said:

“My name is Jill Durst. I am over eighteen years of age and fully competent to make this affidavit. I am personally acquainted with the facts herein, and they are all true and correct. I am employed as the Manager for the Texas Board of Criminal Justice (TBCJ). I am making this affidavit in connection with the above-referenced lawsuit.

As the Manager for the TBCJ, I am familiar with each of the TBCJ members and where they maintain their personal residences. The board members and places of residence are listed as follows:

- TBCJ Chairman, Patrick L. O’Daniel, appointed April 2017, resides in Leander, Texas, Williamson County;
- TBCJ Vice-Chair, Derrellynn Perryman, appointed August 2015, resides in Fort Worth, Texas, Tarrant County;
- TBCJ Secretary, Pastor Larry Miles, appointed August 2014, resides in Amarillo, Texas, Potter County;
- TBCJ Member, Molly Francis, appointed November 2019, resides in Dallas, Texas, Dallas County;
- TBCJ Member, Faith Johnson, appointed November 2019, resides in Dallas, Texas, Dallas County;
- TBCJ Member, Sichan Siv, appointed November 2019, resides in San Antonio, Texas, Bexar County;



- TBCJ Member, Eric Nichols, appointed January 2020, resides in Austin, Texas, Travis County;
- TBCJ Member, Rodney Burrow, M.D., appointed May 2020, resides in Pittsburg, Texas, Camp County;
- Former TBCJ Member, Mano DeAyala resides in Houston, Texas, Harris County. Mr. DeAyala was appointed to the TBCJ in 2017 and resigned in December 2022 after being elected as State Representative for District 133 in November of 2022."

Further Affiant sayeth not.

  
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JILL DURST

Manager

Texas Board of Criminal Justice

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned notary public, on the 22<sup>nd</sup> day of February, 2023.

  
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NOTARY PUBLIC, STATE OF TEXAS

